

**JEFFREY S. CHIESA**

Attorney General of New Jersey  
Attorney for Petitioner  
Department of Law and Public Safety  
1300 Atlantic Avenue  
Atlantic City, New Jersey 08401

By: Timothy C. Ficchi  
Deputy Attorney General  
(609) 317-6218

STATE OF NEW JERSEY  
DIVISION OF GAMING ENFORCEMENT  
DOCKET NO. 12-0318-EL

---

STATE OF NEW JERSEY,  
DEPARTMENT OF LAW AND PUBLIC  
SAFETY, DIVISION OF GAMING  
ENFORCEMENT,

Petitioner,

v.

JOEL D. GIBSON,

Respondent.

---

Civil Action

PETITION FOR PLACEMENT  
ON EXCLUSION LIST

Petitioner, State of New Jersey, Department of Law and Public Safety,  
Division of Gaming Enforcement, located at 1300 Atlantic Avenue, Atlantic City, New  
Jersey, says:

1. Respondent, Joel D. Gibson (hereinafter "Respondent"), is a New  
Jersey resident, residing at [REDACTED] Atlantic City, New Jersey 08401.

---

2. *N.J.A.C. 13:69G-1.3(a)4* authorizes the exclusion of:

any person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein, including

iii Persons who pose a threat to the safety of the patrons or employees of a casino licensee ...

iv. Persons with a documented history of conduct involving the undue disruption of the gaming operations of casino licensees ...

3. On December 16, 2010, Respondent was arrested for the offense of Theft of Property Lost or Mislaid (Fourth Degree), *N.J.S.A. 2C:20-6*, which offense occurred on the premises of Caesars Atlantic City, and was indicted on that charge, Indictment #11-03-00627-I. On September 9, 2011, Respondent plead guilty to an amended charge of Theft (Disorderly Person), and received a sentence of sixty (60) days incarceration, received two (2) years probation, was fined, and was barred from entering the premises of Atlantic City casinos for two (2) years.

4. On March 11, 2011, Respondent was arrested for the offense of Defiant Trespasser *N.J.S.A. 2C:18-3b*, which offense occurred on the premises of Caesars Atlantic City. On April 19, 2011, Respondent plead guilty to that charge and was fined.

5. On March 23, 2012, Respondent violated probation of the Judgment of Conviction Sentencing Statement dated September 9, 2011, for failure to report to his probation officer and failure to appear which resulted in the issuance of a Bench Warrant.

6. The conduct by Respondent, which resulted in the offenses referenced in Paragraphs 1 through 4 above, occurred on the premises of a casino licensee in Atlantic City, New Jersey.

7. Based on information contained in Paragraphs 1 through 6 of this petition, Respondent is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein and should be excluded from casino premises pursuant to *N.J.A.C. 13:69G-1.3(a)4iii* and *N.J.A.C. 13:69G-1.3(a)4iv*.

WHEREFORE, Complainant demands the following relief against Respondent:

A. Judgment that Respondent Joel D. Gibson is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein, within the meaning of *N.J.A.C. 13:69G-1.3(a)(4)iii* and *N.J.A.C. 13:69G-1.3(a)4iv*;

B. Judgment entering a final order placing Respondent Joel D. Gibson on the exclusion list pursuant to *N.J.S.A. 5:12-71* and *N.J.A.C. 13:69G-1.3(a)(4)iii* and *N.J.A.C. 13:69G-1.3(a)4iv*;

C. Judgment for such other relief as the Division of Gaming Enforcement may deem just and appropriate under the circumstances.

Respectfully submitted,  
JEFFREY S. CHIESA  
Attorney General of New Jersey  
~~Attorney for the State of New Jersey~~

By:   
Timothy C. Ficchi  
Deputy Attorney General

Dated: May 21, 2012